

EXHIBIT A

Casey L. Shomaker

From: Casey L. Shomaker
Sent: Tuesday, August 19, 2025 3:37 PM
To: Intellectual Ventures; Allen Gardner
Cc: AA_Intellectual_Ventures
Subject: IV v. AA - Joint Mtn to Amend
Attachments: IV v. AA - Proposed Schedule [8.19.25].docx

Counsel,

In view of the Court's order on IV's Motion to Amend and the upcoming claim construction deadlines, American proposes the parties jointly move to amend the scheduling order. The attached schedule generally tracks the present, but has been adjusted to the expected filing date of IV's Amended Complaint.

Please provide any proposed edits by EOD tomorrow so we can finalize by the end of the week.

Thank you,

McKool Smith | Casey L. Shomaker
Associate | Dallas | (214) 978-4218

Tuesday, August 19, 2025	Filing of Amended Complaint
Thursday, October 23, 2025	Deadline to Respond to Amended Complaint
Friday, February 6, 2026	Serve Initial Disclosures
Friday, March 13, 2026	P.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions (and P.R. 3-2 document production) to be served.
Monday, March 30, 2026	Join Additional Parties.
Friday, April 10, 2026	P.R. 3-3 Invalidity Contentions (and P.R. 3-4 document production) to be served. To extent not already required to be disclosed, exchange Mandatory Disclosures on all issues, including damages.
Monday, April 20, 2026	Parties to exchange proposed terms for construction and identify any claim element governed by 35 U.S.C. § 112, ¶ 6 (P.R. 4-1).
Monday, May 4, 2026	Parties to exchange preliminary proposed claim construction and extrinsic evidence supporting same (P.R. 4-2).
Friday, February 6, 2026	Parties' Final Amended Pleadings (A motion for leave is required.)
Monday, May 25, 2026	Joint Claim Construction and Prehearing Statement to be filed (P.R. 4-3). Provide an estimate of how many pages are needed to brief the disputed claims.
Tuesday, May 19, 2026	Respond to Amended Pleadings
Monday, June 1, 2026	Completion date for discovery on claim construction (P.R. 4-4)
Tuesday, June 16, 2026	Opening claim construction brief (P.R. 4-5(a)).
Tuesday, June 30, 2026	Responsive claim construction brief (P.R. 4-5(b)).
Tuesday, July 7, 2026	Reply claim construction brief (P.R. 4-5(c)).
Tuesday, July 7, 2026	Submit technology synopsis/tutorial (both hard copy and disk).
Monday, July 27, 2026	Parties to file joint claim construction and chart (P.R. 4-5(d)). Parties shall work together to agree on as many claim terms as possible.
Tuesday, August 4, 2026	Proposed Claim Construction hearing August 4, 2026, at 9:00 a.m. at the Paul Brown United States Courthouse, 101 E. Pecan Street, Sherman, Texas 75090.
Friday, August 28, 2026	Privilege Logs to be exchanged by parties (or a letter to the Court stating that there are no disputes as to claims of privileged documents).
Tuesday, September 8, 2026	Deadline for Initial Mandatory Disclosure of all persons, documents, data compilations and tangible things, which are relevant to a claim or defense of any party and which has not previously been disclosed. This deadline is not an extension of earlier deadlines set out in this court's order or the Patent Rules, nor an excuse to delay disclosure of information. It is a "catchall" deadline for provision of all remaining information which may be relevant to a claim or defense of any party at trial.

Friday, January 15, 2027	Deadline to Complete Fact Discovery and File Motions to Compel Discovery.
Monday, February 15, 2027	Parties with burden of proof to designate Expert Witnesses other than claims construction experts and provide their expert witness reports, to include for ALL experts all information set out in Rule 26(a)(2)(B).
Monday, March 8, 2027	Comply with P.R. 3-7. (Designation of Willfulness Opinions).
Monday, March 15, 2027	Parties to Designate Expert Witnesses on issues for which the parties do not bear the burden of proof, and provide their expert witness report, to include for ALL experts all information set out in Rule 26(2)(B). Note: Objections to any expert, including <i>Daubert</i> motions, shall be filed within 3 weeks after the expert's Report has been disclosed. Such objections and motions are limited to ten pages each.
Friday, April 16, 2027	Expert Discovery Deadline. All expert discovery must be served in time to be completed by this date.
Monday, May 17, 2027	Deadline to File Dispositive Motions and any other motions that may require a hearing. Regardless of how many dispositive motions a party files, each party is limited to a total of sixty pages for such motions. Each individual motion shall comply with Local Rule CV-7. Responses to motions shall be due in accordance with Local Rule CV-7(e).
Monday, June 7, 2027	Deadline to File Replies in support of Dispositive Motions.
Monday, June 21, 2027	Deadline to File Sur-Replies in support of Dispositive Motions.
Monday, June 28, 2027	Notice of intent to offer certified records.
Monday, June 28, 2027	Counsel and unrepresented parties are each responsible for contacting opposing counsel and unrepresented parties to determine how they will prepare the Joint Final Pretrial Order (See www.txed.uscourts.gov) and Proposed Jury Instructions and Verdict Form (or Proposed Findings of Fact and Conclusions of Law in nonjury cases).
Tuesday, July 6, 2027	Deposition Designation due. Each party who proposes to offer a deposition shall serve on all other parties a disclosure identifying the line and page numbers to be offered. All other parties will have seven calendar days to serve a response with any objections and request cross-examination line and page numbers to be included. Counsel must consult on any objections, and only those which cannot be resolved shall be presented to the Court. The party who filed an initial Video Deposition Designation is responsible for preparation of the final edited video in

	<p>accordance with all parties' designations, the applicable Federal Rules of Civil Procedure, and the Court's rulings on objections.</p> <p>Serve witness list.</p> <p>Serve exhibit list.</p> <p>Exchange proposed jury instructions and verdict forms.</p>
Tuesday, July 20, 2027	<p>Serve objections to deposition designations; serve rebuttal deposition designations.</p> <p>Serve objections and rebuttals to witness lists and exhibits lists.</p>
Tuesday, July 27, 2027	<p>Motions <i>in limine</i> due.</p> <p>File Joint Final Pretrial Order. Exchange Exhibits and deliver copies to the court. At this date, all that is required to be submitted to the court is a hyperlinked exhibit list on disk (2 copies) and no hard copies.</p>
Tuesday, August 10, 2027	<p>Response to motions <i>in limine</i> due.</p> <p>File objections to witnesses, deposition extracts, and exhibits, listed in pre-trial order. (This does not extend the deadline to object to expert witnesses). If numerous objections are filed the court may set a hearing prior to the final pretrial conference.</p> <p>File Proposed Jury Instructions/Form of Verdict (or Proposed Findings of Fact and Conclusions of Law).</p> <p>If Parties will be requesting daily copy of the transcript during trial, they must notify the Court's court reporter, Chris Bickham, Chris.Bickham@txed.uscourts.gov, by this date.</p>
Tuesday, August 11, 2027	<p>Final Pretrial Conference at 1:00 p.m. at the Paul Brown United States Courthouse, 101 E. Pecan Street, Sherman, Texas 75090.</p>
TBD	<p>10:00 a.m. Jury Selection and Trial at the Paul Brown United States Courthouse located at 101 East Pecan Street in Sherman, Texas.</p>